



1220 L Street, Northwest
Washington, DC 20005-4070
Tel 202/682-8153
Fax 202/682-8426
E-mail sampson@api.org

Tim Sampson
Coordinator, Drilling and
Production Operations

July 1, 1998

Department of the Interior
Minerals Management Service
Mail Stop 4024
381 Elden Street
Herndon, Virginia 20170-4817
Attention: Rules Processing Team (Comments)

The American Petroleum Institute (API) and the Offshore Operators Committee (OOC) appreciate the opportunity to submit the attached comments on the Minerals Management Service (MMS) proposed rule on Postlease Operations Safety. We also commend MMS for conducting the March 24, 1998 public meeting to provide an opportunity for discussion of the MMS criteria for the disqualification of operators.

API represents approximately 400 companies involved in all aspects of the oil and gas industry, including exploration, production, transportation, refining and marketing. The OOC is an organization of over 100 companies who conduct essentially all of the OCS oil and gas exploration and production activities in the Gulf of Mexico.

Our comments are organized by section where changes are recommended. We have included the MMS proposed language, our recommended language or comments, and the rationale for our recommendations.

In general, we recognize the potential benefits associated with rewriting the regulations in "plain English." However, during the review of the proposed rule, we found that there were sections where significant additional regulatory requirements were added as a result of the "plain English" process. We have attempted to point these out in the attached comments.

Another major issue that MMS has addressed in the proposed rule is the "disqualification of operators." We recommend that this section be deleted from the final rule.

If you have any questions, please contact me or Virgil Harris, Executive Director of the Offshore Operators Committee. Mr. Harris can be contacted at 504-566-5251.

Sincerely,